

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

DYNAENERGETICS EUROPE GMBH, §
and DYNAENERGETICS US, INC. §
§
Plaintiffs, §
§
v. § Civil Action No. 6:20-CV-01110-ADA
§
YELLOW JACKET OIL TOOLS, LLC § Jury Trial Demanded
§
Defendant. §
§

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND DEADLINE TO ANSWER OR
OTHERWISE RESPOND TO PLAINTIFFS' ORIGINAL COMPLAINT**

Defendant Yellow Jacket Oil Tools, LLC (“Defendant” or “Yellow Jacket”) files this unopposed motion to extend the deadline by which it must answer or otherwise respond to Plaintiffs’ Original Complaint for Patent Infringement. In support, Defendant states the following:

1. Plaintiff filed their Complaint on December 4, 2020 and served Defendant on December 10, 2020. (ECF Nos. 1, 7).
2. Defendant’s answer or motion under Federal Rule of Civil Procedure 12(b) would be due on Thursday, December 31, 2020.
3. Defendant’s counsel conferred with Plaintiffs’ counsel, who agreed to allow Defendant a thirty (30) day extension to file its answer or otherwise respond to Plaintiffs’ Original Complaint for Patent Infringement, to January 29, 2021.
4. Defendant retains all rights to assert any defense under Federal Rule of Civil Procedure 12(b).

5. The Court has not yet entered a scheduling order, so this extension does not affect any other pre-trial deadlines.

6. Defendant's requested relief is not sought for purposes of delay, but with good cause and so that justice may be done.

Dated: December 29, 2020

Respectfully submitted,

/s/ Amir H. Alavi
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CERTIFICATE OF CONFERENCE

On December 28, 2020, Defendant conferred with Plaintiffs' counsel regarding the relief sought in this motion. Plaintiffs do not oppose the requested extension.

/s/ Amir Alavi
Amir Alavi

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2020, a true and correct copy of this document has been filed electronically via the Court's CM/ECF filing system and subsequently all counsel in this matter deemed to accept service electronically will be notified via the Court's CM/ECF filing system.

/s/ Amir Alavi

Amir Alavi